ON-SITE SYSTEMS, INC. A PUBLIC UTILITY CO. AN 31 AN 8 45

TH RESULTERY AUTHORITY

January 30, 2003

Mr. Dan McCormac Chief, Energy and Water Division Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37243-0505

RE: Docket No: 02-01219 - Request for Information

Dear Mr. McCormac:

In response to your correspondence dated January 30, 2003, requesting additional information, we are providing the following:

1. Communications between you and the City of Clarksville regarding this problem.

Attached please find copies of the following correspondence:

- a. Letter from City of Clarksville to On-Site Systems dated 6/8/98
- b. Letter from City of Clarksville to On-Site Systems dated 3/15/2000
- c. Letter from City of Clarksville to On-Site Systems dated 5/15/2000
- d. Letter from City of Clarksville to On-Site Systems dated 10/11/2000
- e. Letter from City of Clarksville to On-Site Systems dated 10/31/2000
- f. Letter from City of Clarksville to On-Site Systems dated 12/5/2001
- g. Letter from City of Clarksville to On-Site Systems dated 2/15/2002
- h. Letter from City of Clarksville to On-Site Systems dated 2/19/2002
- i. Letter from City of Clarksville to On-Site Systems dated 4/5/2002
- j. Letter from On-Site Systems to City of Clarksville dated 4/10/2002

2. Any complaints by the City of Clarksville, customers, residents or others about this problem of which you are aware.

Attached please find the following correspondence:

a. Faxed correspondence from City of Clarksville to On-Site Systems. In response to this correspondence, on April 15, 2002, Charles Pickney, Robert Pickney and James Stinnett met with the officials from the City of Clarksville at the City Gas and Water Department office on Madison Street in Clarksville, Tennessee. In that meeting, Mr. Dwight Lutton, Manager of the Department stated that the neighbors living near the point of our effluent discharge had been complaining of odor problems. Charles Pickney asked for the names and addresses of the people and on April 25, 2002, we received the attached list by facsimile from the City Gas and Water Department.

Charles Pickney contacted the people and on Monday, April 29, 2002, visited with each homeowner. Each of the individuals confirmed that the problem had been serious and ongoing for several months. Amy Bagwell of 2883 Chinquapin Lane, stated that on many occasions, the odor was so bad that she could not open her windows or go outside to use her deck.

3. Any additional evidence of the existence and severity of this problem

Attached please find copies of the following correspondence:

- a. Letter from USFilter to On-Site Systems dated 1/19/2001
- 4. The consequences, if any, the City of Clarksville informed you would occur if On-Site did not take steps to control the odor problem.

Attached please find copies of the following correspondence:

a. Letter from City of Clarksville to On-Site Systems stating that failure to correct the odor problem would result in a breach of contract and relieve the City from its responsibilities for receiving the flow.

5. Any mention of the February 13, 1998 contract between On-Site Systems, Inc. and the City of Clarksville in previous filing with the TRA by On-Site.

In information provided in our original petition (Docket No: 97-01194) it was noted that the City of Clarksville would be providing treatment for this development. However, the only document available at that time from the City of Clarksville was a standard rate schedule which was included in said petition.

6. A corrected calculation showing On-Site's requested rate adjustment and how this adjustment was arrived at.

See attached Corrected Cost Analysis

7. A revised tariff sheet to reflect the revised rate.

See attached Revised Tariff Sheet

8. Any additional facts you believe would be useful to the TRA in considering this petition.

All the information attached hereto represents all correspondence and information concerning the odor problem.

Sincerely,

Charles Pickney, Jr., President

On-Site Systems, Inc.

The CityOf Clarksville

Office of the City Engineer

135 Commerce Street ■ P.O. Box 387 Clarksville, Tennessee 37041-0387 (931) 645-7418

Fax (931) 645-3598

June 8,1998

On-Site Systems, Inc. 7638 River Road Pike Nashville, TN 37209

Re:

Wastewater Contract

Gentlemen:

Forwarded herewith is an executed copy of the wastewater contract between the City of Clarksville and On-Site Systems, Inc., which will allow the discharge of wastewater from your wastewater collection system serving certain users in the East Montgomery Utility District. This contract was dated the 13th of February 1998; however, it is my understanding that you are just now ready to provide flow into the City; therefore, the City will commence reading the metered discharge from your system on or about June 15, 1998 and will thence read the meter monthly thereafter.

It is noted as mentioned in previous conversations and detailed in the contract that you will be responsible for maintaining odor control systems if necessary if this becomes a problem at the discharge. Also as noted in previous conversations some portions of the force main apparently do not have detector tape in the ditch line to aid in location and to prevent accidental excavation damage. Please advise us as to when you plan to resolve this matter. There are some unresolved restoration complaints regarding landscaping. I hope you will see to it that these matter are also resolved.

Respectfully,

Denzil J. Biter

City Engineer

DJB/th

Enclosures

cc: Dwight Luton - General Manager Gas & Water

by the City. If the meter if found to be accurate, the full cost for said short interval test shall be borne by the City. A meter registering not more than five percent above or below the test results shall be deemed to be accurate. The previous readings on any meter disclosed by the test to be inaccurate shall be corrected for the questioned months previous to such tests in accordance with the percentage of the inaccuracy found by such test. If any meter fails to register for any period, the amount of wastewater furnished during such period shall be deemed to be the amount of wastewater delivered in the corresponding period immediately prior to the failure unless City and On-Site shall agree on different amounts. The metering equipment shall be read monthly by the City.

- On-Site shall bear the full installation expense including design, permitting, construction, cleanup, easement acquisition and all associated costs for the sewer main from the East Montgomery District boundary to aforementioned point at which the flow discharges into the City's present sewer collection system.
- On-Site shall continue to operate, maintain, and repair the sewer force main up to the aforedescribed connection point to the City's gravity system until such time that the City elects to add any other customer to the force main segment between the connection point and the metering point. Thereafter On-Site shall only be responsible for the force main up to the discharge of the metering point.
- (4) On-Site shall coat the interior of the existing receiving manhole on the City's wastewater system with a material that is specifically formulated to resist the corrosive effects of sewer gases. If the discharge is noted to be an objectionable odor problem, On-Site shall input the necessary odor control chemicals or install odor control equipment to control the odor problem.



March 15, 2000

Mr. Bob Pickney On-Site Systems, Inc. 7638 River Road Pike Nashville, TN 37209

Re: Southfork Step System Discharge

Mr. Pickney:

We have recently been monitoring the meter that was temporarily installed at the discharge point for the referenced project and in comparing these readings with the magmeter readings it appears the magmeter is recording the anticipated flow. The meter at the discharge may now be removed and the system reconnected as previously configured.

It is noted that we are continuing to receive odor complaints form the discharge area and our sampling of the discharge from the step system indicates a relatively high hydrogen sulfide measurement. The present discharge which is basically designed as a stripper actually seems to be increasing the amount of sulfide released at this point. As spelled out in the contract, odor control of the discharge is the responsibility of On Site Systems; therefore, additional measures may be required to resolve this problem.

Respectfully.

Denzil J. Biter City Engineer

DJB/th

cc: Kevin Buchannan, Pretreatment Coordinator





May 15, 2000

Mr. Bob Pickney On-Site Systems, Inc. 7638 River Road Pike Nashville, TN 37209

Re:

Southpoint Step System Discharge

Odor Control

Mr. Pickney:

The City is continuing to receive odor complaints from the discharge of the Southridge Step System. The current stripping tower at the discharge seems to be actually aggravating the situation by removing the sulfides from the liquid and disbursing them into the air. Apparently the filter bed is totally ineffective. It appears that some type of chemical control such as the City uses at other points may be necessary.

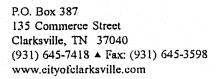
Please take the necessary steps to relieve this situation. If you have any detailed questions concerning this matter you may wish to contact Mr. Kevin Buchanan at (931) 553-2424. Mr. Buchanan is in charge of resolving other sewer odor problems within the City system.

Respectfully,

Denzil J. Biter City Engineer

DJB/th

cc: Kevin Buchanan, Pre Treatment Coordinator





October 11, 2000

On-Site Systems, Inc. 7638 River Road Pike Nashville, TN 37209

Re:

Southridge Sewer

Odor Complaints

Gentlemen:

The City is continuing to receive odor complaints from the discharge of the force main from the Southridge project. A force main from a City maintained lift station discharges into the same manhole; however, the City is treating its sewer discharge by the use of bioxide and tests confirm that the sulfides from the City station are not the problem. The City's contract with On-Site, as indicated on the attached excerpt, notes the responsibility of On-Site to take the necessary measures to control odor problems.

Please take whatever steps are necessary to resolve this matter and advise this office of your intent.

Respectfully,

Denzil J. Biter City Engineer

DJB/th

Enclosure

cc: Rodney Blake, Water Wastewater Manager Kevin Buchanan, Pre-Treatment Coordinator



- (2) On-Site shall bear the full installation expense including design, permitting construction, cleanup, cleanup, easement acquisition and all associated costs for the sewer main from the East Montgomery District boundary to aforementioned point at at which the flow discharges into the City's present sewer collection system.
- (3) On-Site shall continue to operate, maintain, and repair the sewer force main up to the aforedescribed connection point to the City's gravity system until such time that the City elects to add any other customer to the force main segment between the connection point and the metering point. Thereafter On-Site shall only be responsible for the force main from their customers up to the metering point.
- receiving manhole on the City's wastewater system with a material that is specifically formulated to resist the corrosive effects of sewer gases.

 If the discharge is noted to be an objectionable odor problem, On-Site shall input the necessary odor control chemicals or install odor control equipment to control the odor problem.
- (5) Not less than once every two years on the anniversary date of this contract, On-Site shall furnish the City in writing, estimates of wastewater volumes to be delivered by On-Site for the next five years. The estimates shall include average and maximum daily demands.

It is further mutually agreed between the City and On-Site as . follows:

(1) That this contract shall extend for a term of 10



October 31, 2000

On-Site Systems, Inc. 7638 River Road Pike Nashville, TN 37209

Re:

Southridge Sewer STEP System

Odor Complaints

Gentlemen:

Attached is a copy of an e-mail that I received from our Pre-Treatment Coordinator which details the type of complaint we are receiving concerning the referenced matter. I am also enclosing copies of previous letters indicating the problems associated with this STEP System sewer discharge.

To date I have received no response or seen any significant action with regard to attempts to resolve this matter. We consider this to be a significant problem that is adequately defined in the contract. Failure to correct his problem may be considered a breach of the contract and relieve the City from its responsibilities for receiving this flow.

Please advise me of your intentions on this matter.

Respectfully,

Denzil J. Biter City Engineer

DJB/th

Enclosure

cc: Derek Comperry, Comperry Development LLC Rodney Blake, Water Wastewater Manager Kevin Buchanan, Pre-Treatment Coordinator Dwight Luton, Gas & Water General Manager



P.O. Box 387
135 Commerce Street
Clarksville, TN 37040
(931) 645-7418 ▲ Fax: (931) 645-3598
www.cityofelarksville.com

Denzil Biter

From:

Kevin Buchanan

Sent: To:

Friday, October 27, 2000 1:25 PM Denzil Biter; Ed Neely; Rodney Blake

Subject:

STEP system odors

Dear Sirs,

I am getting chewed out strongly on the phone these days for odors on Chinquapin Ln. In fact I got the worst talking to I ever had without actually being cussed. The Mayor's office has also evidently received a call. I have the Cloud Drive L.S. discharge under control, but the On-Site Systems people evidently have not had any success with their odor control efforts.

I'm pretty sure that if we drive a cork in the end of their pipe that the odor problem will go away. If any of you can suggest an alternative method please feel free to contact me. You better hurry though, I already have several citizen volunteers to help me install the cork.

Respectfully, Kevin Buchanan

December 5, 2001



Mr. Bob Pickney On-Site Systems, Inc. 6738 River Road Pike Nashville, TN 37209

RE: Southridge Sewer Odors

Dear Mr. Pickney:

We have recently again been receiving additional complaints concerning the odor from the force main discharge of the Southridge project. Our technicians responded to the complaints and verified that there was a problem. They were at that time unable to contact your office and went to your pumping station where they found the odor control chemical feed was insufficient. They manually increased the feed rate to correct the problem. I am sure you will want to have your personnel verify and readjust as necessary.

As I mentioned before, we feel that a significant part of the odor problem is still relative to the stripper that is located in the discharge manhole. Even when the dissolved sulfide levels are relatively low, this stripper apparently brings most of the sulfides out of solution and leads to the odor problem.

I do not feel that the soil filter process is functional in this case and believe it would actually be better to remove the stripper and pipe the flow so that it enters the main sewer stream with as little turbulence as possible.

Hopefully you can address these matters soon.

Respectfully,

Denzil J. Biter City Engineer

DJB:cjh

cc:

Kevin Buchanan Rodney Blake





February 15, 2002

Mr. Charles Pickney On-Site Systems, Inc. 7638 River Road Nashville, TN 37209

RE: South Point Sewer Discharge

Dear Mr. Pickney:

The City is once again receiving significant odor complaints at the force main discharge from your facility. Our crew's investigation of the complaints indicates that there is indeed a high hydrogen sulfide concentration at the discharge point. It was also noted that there was a significant accumulation of solid matter in the stripper that had installed on the discharge pipe and actually some solids coming out of the discharge.

We therefore questioned if perhaps there may be some problem with your system because we normally have not seen any obviously visible solids in your effluent. Due to this accumulation in the scrubber, our crews removed the interior portion of the scrubber because of the odor emanating from this accumulation. Our crews also checked your pumping site and found that the odor control chemical feed was virtually cut off, therefore not providing enough additive to be effective.

Please contact me regarding this matter to advise me of your intentions to resolve these complaints.

Respectfully

Denzil J. Biter City Engineer

DB/mlm

XC:

Dwight Luton Rodney Blake Kevin Buchanan

onsitesyst.db.021502



P.O. Box 387
2215 Madison Street
Clarksville, TN 37041-0387
(931) 645-7418 ▲ Fax (931) 648-5983
www.cityofclarksville.com

February 19, 2002



Mr. Bob Pickney On-Site Systems, Inc. 7638 River Road Pike Nashville, TN 37209

RE: South Pointe Sewer Discharge

Dear Mr. Pickney:

To confirm our recent phone conversation, it is noted that the City is once again receiving significant odor complaints at the force main discharge from your facility. Our crews' investigation of the complaints indicated that there is indeed a high hydrogen sulfide concentration at the discharge point. It was also noted that there was a significant accumulation of solid matter in the stripper that had been installed on the discharge pipe and actually some solids coming out of the discharge.

We therefore question if perhaps there may be some problem with your system since we normally would not have seen obviously visible solids in your effluent. Due to this accumulation in the scrubber, our crews removed the interior portion of the scrubber because of the odor eminating from this accumulation.

Our crews also checked your pumping site and found that the odor control chemical feed was virtually cut off and therefore was not providing enough additive to be effective.

Please contact me or Kevin Buchanan in regard to this matter and advise of your intentions for resolving these complaints.

Respectfully,

Denzil J. Biter City Engineer

DJB:cjh

cc: Mr. Dwight Luton

Mr. Rodney Blake Mr. Kevin Buchanan



KEVIN BUCHANAN ENVIRONMENTAL COMPLIANCE COORDINATOR PHONE: (931)645-7469 FAX: (931)648-5983

E-MAIL: kbuchanan@clarksville.com



April 5, 2002

On-Site Systems, Inc. 7638 River Road Nashville, TN 37209

RE: Southridge Sewer Odor Complaints

Gentlemen:

We continue to have significant odors at Chinquapin Drive at the force main discharge from your facility. Records of liquid and atmospheric sulfide samples are available. This problem has been ongoing for several years and the residents of Chinquapin Drive have had to consistently endure not only the nuisance and embarrassment of the problem but also the potential diminishment of property values.

The well being of the residents of the City of Clarksville is of great importance to us. We therefore must consider your failure to control the odors from your discharge as a breach of your Wastewater Contract, and we require that you input the necessary chemicals or install odor control equipment to control the odor problem immediately and permanently. If you cannot meet these requirements we will require that you discontinue your discharge.

We request that you submit, within 10 days of receipt of this letter, a written response to the above referenced problems. If you have questions or comments regarding this matter, please feel free to contact me.

Respectfully,

Kevin Buchanan

xc: Denzil Biter, City Engineer
Dwight Luton, General Manager
Rodney Blake, Water/Wastewater Manager
Derek Comperry, Developer



P.O. Box 387 2215 Madison Street Clarksville, TN 37041-0387 (931) 645-7400

On-Site Systems, Inc. 7638 River Road Pike Nashville, TN 37209

Office: (615) 356-2880 Fax: (615) 356-7295

April 10, 2002

Mr. Kevin Buchanan Environmental Compliance Coordinator The City of Clarksville - Gas & Water Department 2215 Madison Street Clarksville, TN 37041-0387

RE: Letter of April 5, 2002 - Southridge Sewer Odor Complaints

Dear Mr. Buchanan:

When our company received your letter last Friday (April 5th), we were surprised! No one had called us for a month prior to the date of the letter saying there was a problem. Coincidentally, James Stinnett from our company was at the discharge site at 7:30 a.m. on the morning of April 5, 2002. There were no odor problems at the discharge site at that time and the tests he ran on the effluent discharge showed that hydrogen sulfide levels were at zero. To receive a threatening letter of this type – addressed to no one – with no notice and no opportunity to address the reported problem is an insult and a clear indication that a communication problem exists between the City of Clarksville and On-Site Systems, Inc.

While we have had problems with odors in the past, since On-Site Systems purchased and installed an odor control chemical feed system in mid-June of 2001, problems have diminished significantly. In discussions with the nearest neighbors to the discharge location, they have stated to us that they have had no significant problems with odor since that time. We have not breached our Wastewater Contract with the city.

I would like for representatives from the Clarksville Gas & Water Department to meet with representatives from On-Site Systems, Inc. to discuss the reported odor problem and the communication problem as soon as possible.

Sincerely,

Charles Pickney, Jr

President

Cc/Denzil Biter, City Engineer

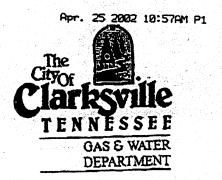
Dwight Luton, General Manager

Rodney Blake, Water/Wastewater Manager

Derek Comperry, Developer

FROM : CLARKSUILLE GAS & WATER/ENGR E PHONE NO. : 931 645 3598

Gateway To The New South.



FACSIMILIE COVER SHEET

PERSONAL & CONFIDENTIAL TO ADDRESSEE

DATE:	April 25. , 2002 PAGES 10 FOLLOW: 0		
TO:	Charles Pickney, Jr.		
	On-Site Systems, Inc.		
FROM:	Dwight Lucon, General Manager		
RE:	Odor Complaints Received		
Mr. Pickney:			
Listed helow	are the names, addresses and phone numbers of residents		
who have expe	rienced odor problems.		
Berry Marrow.			
Amy Bagwell,	2883 Chinquapin Lane, (931) 920-7863/552-2976		
Sonya Wallace	2879 Chinguapin Lane, (931) 647-6425		



P.O. Box 387 2215 Madison Street Clarksville, TN 37041-0387 (931) 645-7400

Post-it* Fax Note 7671	Date 4/25/07 pages 1	
To Charles Dickney	From Sourially Ive y	
Co./Dept.	Co. /	
Phone #	Phone #	
Fax # 356 - 1295	Fax #	

January 19, 2001

Mr. Bob Pickeny On Site Systems Inc. 7638 River Road Pike Nashville, TN 37209

Subject: BIOXIDE® System for the South Ridge Step System

Dear Mr. Pickeny:

I visited with the Clarksville Water & Sewer Department today and found a better and more economical way to feed BIOXIDE® into the force main going from South Ridge to the City of Clarksville. We can install an above ground tank and feed system at the metering station on Hwy 12 and control the H2S at the end of the force main.

USFilter will deliver the following equipment:

1 – 2,550 gallon BIOXIDE® storage tank (above ground)

- 1 Skid mounted feed system with two (2) ALLDOS pumps rated for 20 gpd at 80 psi.
- 1 Force main injection system
- * All valves and piping needed to feed BIOXIDE® into the force main.
- * One (1) day installation assistance

Total Price: \$19,999.00

Price does not include chemical or submittals.

BIOXIDE® feed rate will be around 10 GPD. You will need to supply the following:

- 1. Level area 14' x 14' to set the tank and the feed system (gravel or concrete).
- 2. Force main tap.
- 3. 120 VAC, 15 amp, 60 Hz, single phase power to the control panel.

I look forward to working with you on this project and if you have any questions, please call me at 800-345-3982 or mobile 941-928-5093.

Sincerely, USFILTER

Donald Orange

Davis Process Sales Representative

F:\Group\cf\OnSiteSystem\SouthRidgeStepSystemBioxide.doc\2020Revised

cc: Mr. Rodney Blake - Clarksville Water & Gas





October 31, 2000

On-Site Systems, Inc. 7638 River Road Pike Nashville, TN 37209

Re:

Southridge Sewer STEP System

Odor Complaints

Gentlemen:

Attached is a copy of an e-mail that I received from our Pre-Treatment Coordinator which details the type of complaint we are receiving concerning the referenced matter. I am also enclosing copies of previous letters indicating the problems associated with this STEP System sewer discharge.

To date I have received no response or seen any significant action with regard to attempts to resolve this matter. We consider this to be a significant problem that is adequately defined in the contract. Failure to correct his problem may be considered a breach of the contract and relieve the City from its responsibilities for receiving this flow.

Please advise me of your intentions on this matter.

Respectfully,

Denzil J. Biter City Engineer

DJB/th

Enclosure

cc: Derek Comperry, Comperry Development LLC Rodney Blake, Water Wastewater Manager Kevin Buchanan, Pre-Treatment Coordinator Dwight Luton, Gas & Water General Manager



CORRECTED

COST ANALYSIS

FOR AN AVERAGE OF 80 CUSTOMERS NUMBER OF GALLONS NEEDED TO CONTROL ODORS

6 Gallons per day x 365 days = 2190 Gallon/yr

COST PER CUSTOMER PER MONTH

Bioxide – Costs \$2/Gallon (See U.S. Filter invoice)

2190 gal/yr x \$2.00 per gallon = \$4,380.00/yr

Cost per customer per year = $\frac{4380}{80}$ = \$54.75

Cost per customer per month = $\frac{54.75}{12}$ = \$4.56

On-Site Systems, Inc. Sewer Service Billing Summary Residential Sewer Rates

System	Monthly Charge
Oakwood Subdivision – Maury County	\$36.67
Southridge Subdivision – Montgomery County	\$23.94 + act cost
Swan Harbor – Roane County	\$35.11
River Road Utility District – Cheatham County	\$31.15
Milcrofton Utility District – Williamson County	\$37.21
Tall Oaks Subdivision – Blount County	\$35.11
Yoakum Hollow Dev. (Windsor Pt) - Campbell County	\$35.11
Shreibman Development – Cannon County	\$35.11
Cornerstone of Mitchell Creek – Overton County	\$35.11
Bolton Area – Shelby County	\$32.68
Ussery #1- Sevier County	\$35.11
Harbor Pointe – Dekalb County	\$35.11
Hidden Springs Resort - Sevier County	\$35.11
Eagle Crest Development – Sevier County	\$35.11
Legacy Bay – Hawkins County	\$35.11
Dollywood Project - (Dream Catcher Ridge) - Sevier County	\$35.11
Homestead Suddivision – Sevier County	\$35.11
Rice Property – DeKalb County	\$35.11
East Stewart – Stewart County	\$30.98 – Lagoon \$35.11 – Sand Gravel Filter

On-Site Systems, Inc. Sewer Service Billing Summary Residential Sewer Rates

Jackson Bend Subdivision - Blount County	\$35.11
Browning Subdivision – Knox County	\$35.11 \$30.98 + 3% Franchise fee \$35.11 + 3% Franchise fee
City of Coopertown - Robertson County - Lagoon - Sand-Gravel Filter	
Eagle Springs – Sevier County	\$35.11
Horseshoe Bend – Bedford County	\$35.11
Eagle Crest II – Sevier County	\$35.11
The Highlands – Sevier County	\$35.11
Falling Waters – Sevier County	\$35.11